

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

**RAPID DEFENSE NETWORK and  
TRANSGENDER LAW CENTER,**

**Plaintiffs,**

**v.**

**UNITED STATES IMMIGRATION &  
CUSTOMS ENFORCEMENT**

**Defendant.**

**Case No. 21-cv-6788 (PGG)**

**MOTION FOR ADMISSION  
*PRO HAC VICE***

Pursuant to Rule 1.3(c) of the Local Rules of the Southern and Eastern Districts of New York, I, Matthew E. Kelley, hereby move this Court for admission *pro hac vice* in the matter captioned above as counsel for Plaintiffs Rapid Defense Network and Transgender Law Center.

As set forth in the accompanying Declaration, I am a member in good standing of the bars of the Commonwealth of Virginia and the District of Columbia. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. There are no disciplinary proceedings currently pending against me. I have attached my declaration and certificates of good standing as required by Local Rule 1.3(c).

Dated: September 17, 2021

Respectfully submitted,

/s/ Matthew E. Kelley

Matthew E. Kelley  
BALLARD SPAHR LLP  
1909 K Street, NW, 12th Floor  
Washington, DC 20006  
Tel: (202) 508-1112  
Fax: (202) 661-2299  
kelley@ballardspahr.com